

# STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR RECORD AUDIT

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<b>Operator: AMEREN ILLINOIS COMPANY</b>	Operator ID#: 32513
<b>Inspection Date(s): 4/6/2016, 4/7/2016</b>	Man Days: 3
<b>Inspection Unit: Kewanee</b>	
<b>Location of Audit: Kewanee</b>	
<b>Exit Meeting Contact: Chris Juliusson</b>	
<b>Inspection Type: Standard Inspection - Record Audit</b>	
<b>Pipeline Safety Representative(s): Kevin Hecker, Randy Stewart</b>	
<b>Company Representative to Receive Report: Michael Fuller</b>	
<b>Company Representative's Email Address: mfuller2@ameren.com</b>	

<b>Headquarters Address Information:</b>	300 Liberty Peoria, IL 61602 Emergency Phone#: (800) 755-5000 Fax#:	
<b>Official or Mayor's Name:</b>	Ron Pate Phone#: (217) 424-6518 Email:	
<b>Inspection Contact(s)</b>	<b>Title</b>	<b>Phone No.</b>
Chris Juliusson	Quality Assurance Consultant	

Gas System Operations	Status
Gas Transporter	<b>Multiple take points. (listed below)</b>
<u><b>General Comment:</b></u> Atkinson - NGPL Sheffield - NGPL Kewanee/Annawan - NGPL Ophiem - ANR Mineral - NGPL Manlius - NGPL Wyanet - NGPL Cambridge - ANR Andover - ANR	
Annual Report (Form 7100.1-1) reviewed for the year:	<b>Not Checked</b>

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<b><u>General Comment:</u></b>		
A thorough review of Ameren's annual report was conducted in March 2016.		
Unaccounted for Gas	.86%	
Number of Services	822092	
Miles of Main	17045.4	
Is the operator maintaining documentation verifying their Maximum Allowable Operating Pressure(s)? (MAOP)	Not Checked	
<b><u>General Comment:</u></b>		
MAOP records are maintained at Decatur Plaza and were not reviewed during this audit.		
Operating Pressure (Feeder)	various depending on location.	
Operating Pressure (Town)	various depending on location.	
Operating Pressure (Other)	Not Applicable	
<b><u>General Comment:</u></b>		
Ameren classifies the operating pressures as either "Town" or "Feeder", therefore "other" operating pressures are not applicable to Ameren Kewanee.		
MAOP (Feeder)	various depending on location.	
MAOP (Town)	various depending on location.	
MAOP (Other)	Not Applicable	
<b><u>General Comment:</u></b>		
Ameren classifies the operating pressures as either "Town" or "Feeder", therefore "other" operating pressures are not applicable to Ameren Kewanee.		
Does the operator have any transmission pipelines?	Yes	
<b><u>General Comment:</u></b>		
Ameren maintains approximately 33.5 miles of transmission pipelines within the Kewanee Operating Center territory.		
<b>Regulatory Reporting Records</b>		<b>Status</b>
[191.5]	Were Telephonic Notices of Incidents reported to the NRC (800-424-8802)?	Not Applicable
<b><u>General Comment:</u></b>		
There were no reportable incidents within the Ameren Kewanee Operating territory in 2014.		

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[191.9(a)]	Was a DOT Incident Report Form F7100.1 submitted within 30 days after detection of an incident?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>There were no reportable incidents within the Ameren Kewanee Operating territory in 2014.</i>		
[191.9(b)]	Were any supplemental incident reports submitted when deemed necessary?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>There were no reportable incidents within the Ameren Kewanee Operating territory in 2014, therefore no supplemental reports were required.</i>		
Did the operator have any plastic pipe failures in the past calendar year?		<b>No</b>
Did the operator take action to mitigate safety concerns relating to the failure of the PE or pipeline components?		<b>No</b>
[191.23(a)]	Did the operator report Safety Related Conditions?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>There were no safety related conditions identified in 2014.</i>		
[191.25]	Did the Operator file a Safety Related Condition Report within 5 working days of determination, but not later than 10 working days after discovery?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>There were no safety related conditions identified in 2014.</i>		
[192.16(c)]	Customer Notification: Has the operator notified each new customer within 90 days about the customer's responsibility regarding buried piping, however, operators of a master meter may continuously post a general notice in a permanent location?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>Ameren Illinois sends all new customers notification of responsibility at the time the customer signs up for service. This notification is in addition to any brochures distributed as part of Ameren's Public Awareness Plan. These records are maintained at the Pawnee Operating Center and were not reviewed during this audit.</i>		
TEST REQUIREMENTS		Status
[192.517(a)][192.505,192.507,192.511(c)]	Are pressure test records being maintained for piping operating above 100 psig?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>High pressure distribution and transmission records are housed at Decatur Plaza and were not reviewed as part of this audit.</i>		
[192.517(b)][192.511,192.509,192.513]	Are pressure test records being maintained for at least 5 years on piping operating below 100 psig?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Staff reviewed pressure test records for 2014.</i>		

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[192.603(b)][192.725]	Were service lines temporarily disconnected from the main properly tested prior to reconnection?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> Service lines are tested prior to reconnection. Staff reviewed service order records for 2014, indicating that lines were retested from the point of disconnection to the riser.		
<b>UPRATING</b>		<b>Status</b>
<b><u>Category Comment:</u></b> No pipeline segments within Ameren Kewanee's territory were uprated in 2014.		
[192.555][192.555]	Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of 30% or more SMYS?	<b>Not Applicable</b>
[192.557][192.557]	Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of less than 30% SMYS?	<b>Not Applicable</b>
<b>OPERATIONS</b>		<b>Status</b>
[192.603(b)][192.605(a)]	Has the operator conducted a review of the Operations and Maintenance Manual once per yr/15 months?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> Staff reviewed records of O&M reviews conducted on 1/29/14, 7/28/14 and 12/9/14 at Ameren Kewanee.		
Has the operator conducted a review of the Operator Qualification Plan once per yr/15 months?		<b>Not Checked</b>
<b><u>General Comment:</u></b> These records are maintained at the Pawnee Operating Center and were not reviewed during this audit.		
[192.603(b)][192.605(b)(3)]	Are construction records, maps, and operating history available to operating personnel?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> The laptops in each truck contain the records and maps of the gas system, as well as some of the operating history. Supervisors have access to additional operating history information at the Operating Center if necessary.		
[192.603(b)][192.605(b)(8)]	Has the operator periodically reviewed personnel's work to determine the effectiveness of normal O&M procedures when deficiencies are found?	<b>Not Checked</b>
<b><u>General Comment:</u></b> These records are maintained at the Pawnee Operating Center and were not reviewed during this audit.		
<b>CONTINUING SURVEILLANCE RECORDS</b>		<b>Status</b>
[192.603(b)][192.613(a)]	Has the operator reviewed continuing surveillance records for class location changes, failures, leak history, corrosion, changes in cathodic protection, and other unusual operating and maintenance conditions?	<b>Satisfactory</b>

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<b><u>General Comment:</u></b> Staff reviewed patrol records for 2014.		
[192.491][192.489]	Does the operator have records verifying if exposed cast iron was examined for evidence of graphitization and if necessary what appropriate action was taken concerning graphitization?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> Ameren Kewanee's operating territory contains no cast iron pipelines.		
[192.603(b)][192.755]	Does the operator have surveillance records of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leak history, or any other unusual operating and maintenance conditions?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> Ameren Kewanee's operating territory contains no cast iron pipelines.		
[192.603(b)][192.753(a)]	Is each cast iron caulked bell and spigot joint that is subject to a pressure of more than 25 (psig.) sealed as required?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> Ameren Kewanee's operating territory contains no cast iron pipelines.		
[192.603(b)][192.753(b)]	Is each cast iron caulked bell and spigot joint that is subject to a pressure of 25 (psig.) or less and is exposed for any reason sealed as required?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> Ameren Kewanee's operating territory contains no cast iron pipelines.		
<b>DAMAGE PREVENTION RECORDS</b>		<b>Status</b>
<b><u>Category Comment:</u></b> These records are maintained at the Pawnee Operating Center and will be reviewed during a separate audit.		
[192.603(b)][191.11(a)]	Did the operator track the number of damages per 1000 locate requests for the previous years?	<b>Not Checked</b>
Has the number of damages increased or decreased from prior year?		<b>Not Checked</b>
[192.603(b)][192.617]	Does the operator track records of accidents due to excavation damage to ensure causes of failures are addressed to minimize the recurrence?	<b>Not Checked</b>
[192.603(b)][192.614(c)(3)]	Does the operator provide documentation pertaining to notification of excavation, marking, positive response, and the availability and use of the one call system?	<b>Not Checked</b>

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Does the operator have a Quality Assurance Program in place for monitoring the locating and marking of facilities?		<b>Not Checked</b>
Do pipeline operators include performance measures in facility locating contracts?		<b>Not Checked</b>
[IL ADM. CO.265.100(b)(1)]	Was third party damage to mains involving a release of gas reported to ICC JULIE Enforcement? <a href="http://www.icc.illinois.gov/julie/">http://www.icc.illinois.gov/julie/</a>	<b>Not Checked</b>
Has the Operator adopted applicable sections of the Common Ground Alliance Best Practices?		<b>Not Checked</b>
Were Common Ground Alliance Best Practices discussed with the Operator?		<b>Not Checked</b>
<b>EMERGENCY PLANS</b>		<b>Status</b>
[192.603(b)][192.615(b)(1)]	Are supervisors, responsible for emergency action, furnished copies of the latest edition of the Emergency Plan?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>The Emergency Plan is reviewed January of each year by all company employees. Employees have access to the emergency plan at all times.</i>		
[192.603(b)][192.615(b)(2)]	Has the operator maintained documentation that the appropriate operating personnel have received training to assure they are knowledgeable of emergency procedures and that the training was effective?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Staff reviewed documentation of Ameren's Annual Emergency Plan and Security Plan Review conducted on 3/20/2014.</i>		
[192.603(b)][192.615(b)(3)]	Has the operator maintained documentation of employee activity reviews to determine whether the procedures were effectively followed in each emergency?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>There were no emergencies experienced in within the Ameren Kewanee territory in 2014.</i>		
[192.603(b)][192.615(c)]	Has the operator maintained documentation that the operator established and maintained liaison with appropriate fire, police and other public officials?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>Staff will review emergency liaison meeting records during a separate audit at Ameren's Pawnee operating center in the near future.</i>		
[192.603(b)][192.615(a)(3)]	Did the review of emergency response time intervals regarding odor/leak complaint documentation indicate adequate emergency response intervals were achieved?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>Staff will review emergency response intervals during a separate audit at Ameren's Pawnee operating center.</i>		
<b>ODORIZATION OF GAS</b>		<b>Status</b>

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[192.603(b)][192.625(f)]	Has the operator maintained documentation of odorant concentration level testing using an instrument?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Staff reviewed odorant concentration level testing records. Staff also confirmed that the Heath Odorator utilized for these tests was calibrated on 9/26/13 and 10/13/14.</i>		
[192.603(b)][192.625(e)]	Has the operator maintained documentation of odorizer tank levels?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Staff reviewed odorizer tank level records for 2014.</i>		
[192.603(b)][192.625(f)(1)]	Are master meter operators receiving written verification of odorant concentration levels from their gas supplier?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>Ameren Kewanee is not a master meter operator.</i>		
[192.603(b)][192.625(f)(2)]	Has the master meter operator maintained documentation of sniff tests performed as required by this section?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>Ameren Kewanee is not a master meter operator.</i>		
<b>PATROLLING &amp; LEAKAGE SURVEY</b>		<b>Status</b>
[192.603(b)][192.721(b)(1)]	Is the operator patrolling business districts at a minimum of 4 per year/4 1/2 months?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>There are no pipelines within Ameren Kewanee's operating territory that apply to this code part.</i>		
[192.603(b)][192.721(b)(2)]	Is the operator patrolling outside business districts at a minimum of 2 per year/7 1/2 months?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Staff reviewed patrol records for outside the business district.</i>		
[192.603(b)][192.723(b)(1)]	Is the operator performing leakage surveys in business districts at a minimum of 1 per year/ 15 months? If the operator has inside meter sets that meet this criterion then were those surveyed?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Staff reviewed Leakage Survey records for 2014. In order to determine if inside meter sets were included in the survey, addresses of inside meter sets were selected randomly and confirmed on survey records.</i>		
[192.603(b)][192.723(b)(2)]	Is the operator performing leakage surveys outside a business district at a minimum of every 5 years/63 months? Is the operator performing leakage surveys on cathodically unprotected pipelines at a minimum of every 3 years/39 months? If the operator has inside meter sets	<b>Satisfactory</b>

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	that meet this criterion then were those surveyed? If the operator has yard lines then are those being surveyed?	
<b><u>General Comment:</u></b> <i>Staff reviewed surveys for areas outside of the business district.</i>		
<b>YARD LINES - RESIDENTIAL</b>		<b>Status</b>
[220 ILCS 2.2.03]	Has the operator designated and documented the location of all services where the meter is located more than 3 feet away from the wall of a residence?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>The operator was able to provide a list of all yard lines in the Kewanee territory.</i>		
[192.463,220 ILCS 2.2.03][220 ILCS 2.2.03]	Has the operator determined if cathodic protection is required on these services?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Ameren does not provide cathodic protection on yard lines within the Ameren Kewanee territory.</i>		
[192.723(b)(1),192.723(b)(2)][220 ILCS 2.2.03]	After the determination of the cathodic protection requirements, has the operator surveyed each line within the required leakage survey intervals?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>The last survey was conducted in 2013 for all yard lines within the Ameren Kewanee operating territory, therefore none were required in 2014.</i>		
<b>ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES</b>		<b>Status</b>
[192.603(b)][192.727(b)]	Did the operator maintain documentation demonstrating that each pipeline abandoned in place was disconnected from all sources and supplies of gas, and purged of gas?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Staff reviewed documentation of a 42' section of 4" steel that was abandoned in Galva. This project packet included the purge plan and procedures for abandonment.</i>		
[192.603(b)][192.727(c)]	Did the operator maintain documentation demonstrating that each inactive pipeline that is not being maintained under this part was disconnected from all sources and supplies of gas; purged of gas?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>Ameren Kewanee did not have any pipelines that were made inactive during 2014.</i>		
[192.603(b)][192.727(d)]	Did the operator maintain documentation demonstrating that whenever service to a customer was discontinued access to gas was either; locked, prevented by a mechanical fitting, or disconnected from the gas supply and open pipe ends sealed?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		



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<i>Ameren uses a computerized service order system to record services that are locked off and the method used. (typically services are pin-locked)</i>		
[192.603(b)][192.727(e)]	Did the operator maintain documentation when air was used for purging that a combustible mixture was not present after purging?	<b>Satisfactory</b>
[192.727(g)][192.727(g)]	Did the operator maintain documentation for each abandoned onshore pipeline facility that crosses over, under or through a commercially navigable waterway?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>There are no abandoned pipelines crossing navigable waterways within Ameren Kewanee's operating territory.</i>		
<b>PRESSURE LIMITING AND REGULATION</b>		<b>Status</b>
[192.603(b)][192.739(a)]	Is the operator inspecting and testing the pressure limiting and regulating stations at a minimum of 1 per year/15 months?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Staff reviewed regulator station inspections for 2014.</i>		
[192.603(b)][192.743(a)]	Is the operator inspecting pressure limiting and regulating stations for adequate capacity at a minimum of 1 per year/15 months?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Staff was able to confirm regulators are checked annually for capacity. These inspections are listed as "engineering evaluations" in Ameren's GCS system.</i>		
[192.603(b)][192.743(b)]	If the operator used calculations to determine sufficient capacity, were the calculation reviews documented at a minimum of 1 per year/15 months?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>These records are maintained in the Peoria Operating Center and were not reviewed during this audit.</i>		
[192.603(b)][192.741(a),192.741(b)]	Is each distribution system supplied by more than one district pressure regulating station, or where required by the operator on a system supplied by a single regulating station, equipped with telemetering or recording pressure gauges to indicate the gas pressure in the district?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>These records are housed in the Peoria Persimmon Street office and were not reviewed as part of this audit.</i>		
[192.603(b)][192.741(c)]	If there were indications of abnormally high- or low-pressure, were actions taken to correct any unsatisfactory operating conditions?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>These records are housed at Decatur Gas Control and were not reviewed as part of this audit.</i>		

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[192.603(b)][192.743(a),192.743(b),192.195(b)(2)]	Is overpressure protection provided by the supplier pipeline downstream of the take point?	<b>Yes</b>
<b><u>General Comment:</u></b> <i>All Ameren take points within Ameren Kewanee's operating territory contain over pressure protection, except for Atkinson, Sheffield and Annawan. These take points are scheduled to have over pressure protection installed in 2019 or thereafter.</i>		
[192.603(b)][192.743(a)]	If Yes, does the operator have documentation to verify that these devices have adequate capacity?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>These records are maintained at the Peoria Operating Center and were not reviewed during this audit.</i>		
<b>VALVE MAINTENANCE</b>		<b>Status</b>
[192.603(b)][192.747(a),192.747(b)]	Did the operator inspect and maintain distribution valves necessary for the safe operation of the system at a minimum of 1 per year/15 months?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Staff reviewed emergency valve inspection records for 2014 in GCS.</i>		
[192.603(b)][192.749(a)]	Did the operator inspect and maintain vaults > 200 cubic feet at a minimum of 1 per year/15 months?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>Ameren Kewanee contains no vaults.</i>		
<b>Investigation Of Failures</b>		<b>Status</b>
[192.603(b)][192.617]	Did the operator experience accidents or failures requiring analysis?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>Ameren Kewanee experienced no accidents or failures requiring analysis.</i>		
<b>WELDING OF STEEL PIPE</b>		<b>Status</b>
[192.603(b)][192.225(b)]	Does the operator have documentation for their qualified welding procedure?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>The operator's welding procedures are included in the O&amp;M in the section titled, WELD - Welding.</i>		
[192.603(b)][192.227,192.229]	Does the operator have documentation of welder qualification as required?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>Documentation of welder qualification/re-qualification is maintained at the Pawnee Operating Center and were not reviewed during this audit.</i>		
[192.807]	Does the operator have documentation of welder OQ records?	<b>Not Checked</b>

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<b><u>General Comment:</u></b>		
Documentation of welder qualification/re-qualification is maintained at the Pawnee Operating Center and were not reviewed during this audit.		
[192.709][192.243(b)(2)]	Does the operator have documentation of NDT personnel qualification as required?	<b>Not Checked</b>
<b><u>General Comment:</u></b>		
NDT records are maintained at Decatur Plaza and were not reviewed during this audit.		
[192.709][192.243(f)]	Does the operator have documentation of NDT testing performed?	<b>Not Checked</b>
<b><u>General Comment:</u></b>		
NDT records are maintained at Decatur Plaza and were not reviewed during this audit.		
<b>JOINING OF MATERIAL OTHER THAN WELDING</b>		<b>Status</b>
[192.603(b)][192.285]	Are persons making joints with plastic pipe qualified?	<b>Not Checked</b>
<b><u>General Comment:</u></b>		
These records are maintained at the Pawnee Operating Center and were not reviewed during this audit.		
[192.603(b)][192.287]	Are persons inspecting plastic pipe joints qualified?	<b>Not Checked</b>
<b><u>General Comment:</u></b>		
These records are maintained at the Pawnee Operating Center and were not reviewed during this audit.		
[192.603(b)][192.283]	Are qualified joining procedures for plastic pipe in place?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		
The joining procedures are located in section "POLY - Polyethylene Pipe" of the operator's O&M.		
<b>CORROSION CONTROL RECORDS</b>		<b>Status</b>
[192.491(a)][192.491(a)]	Has the operator maintained maps or records of cathodically protected piping, cathodic protection facilities, galvanic anodes, and neighboring structures bonded to the cathodic protection system?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		
Ameren maintains an electronic mapping system (GCS) which includes this information.		
[192.491][192.459]	Has the operator maintained documentation of an examination when buried pipe was exposed?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		
Staff reviewed buried pipe examination forms for 2014.		
[192.491][192.465(a)]	Has the operator maintained documentation of annual pipe-to-soil monitoring performed at a minimum of 1 per yr/15 months and/or isolated services or short sections of	<b>Satisfactory</b>

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	main less than 100 feet at a minimum of 10% annually?	
<b><u>General Comment:</u></b> <i>Staff reviewed records for pipe-to-soil monitoring, including isolated segments, in the GCS system for 2014.</i>		
[192.491][192.465(b)]	Has the operator maintained documentation of rectifier or other impressed current power sources inspections at a minimum of 6 per year/ 2 1/2 months?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Staff reviewed rectifier inspections for Ameren Kewanee in the GCS system for 2014.</i>		
[192.491][192.465(c)]	Has the operator maintained documentation of each critical interference bond, reverse current switch, diode, etc. inspections at a minimum of 6 per year/ 2 1/2 months and/or non-critical interference bond inspections at a minimum of 1 per year/15 months?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>There are no bonds (critical or non-critical) within the Ameren Kewanee operating territory.</i>		
[192.491][192.465(d)]	Has the operator taken prompt remedial actions to correct any deficiencies indicated by the monitoring?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>There are no bonds (critical or non-critical) within the Ameren Kewanee operating territory.</i>		
[192.491][192.465(e)]	Has the operator maintained documentation of unprotected pipeline surveys, inspections, or tests at a minimum of 3 years/39 months?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>There are no segments of unprotected pipelines within Ameren Kewanee's operating territory.</i>		
[192.491][192.467(a),192.467(c),192.467(d)]	Has the operator maintained documentation of inspections or tests for electrical isolation at casings?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Staff reviewed electrical isolation tests in the GCS system for 2014.</i>		
[192.491][192.469]	Does the operator have a sufficient number of test stations or other contact points for electrical measurement to determine the adequacy of cathodic protection?	<b>Satisfactory</b>
[192.491][192.471]	Has the operator maintained documentation of corrective actions taken when a test lead is no longer electrically conductive?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>Ameren Kewanee did not experience any instances of test leads becoming electrically uncondusive in 2014.</i>		

# STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR RECORD AUDIT

Unless otherwise noted, all code references are to 49CFR Part 192.

If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

[192.491][192.473(b)]	Has the operator maintained documentation of inspections or tests to assure their cathodic protection system is not affecting adjacent underground metallic structures?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Staff reviewed records for testing of "adjacent foreign crossings" in the GCS system for 2014.</i>		
[192.491][192.475(a)]	Has the operator maintained documentation of investigations or steps taken to minimize internal corrosion due to transportation of corrosive gas?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>Ameren Kewanee does not transport corrosive gas.</i>		
[192.491][192.475(b)]	Has the operator maintained documentation of internal surface inspections performed when pipe is removed for any reason?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>The buried pipe examination form includes fields for internal surface inspections. Staff reviewed these forms for 2014.</i>		
[192.491][192.477]	Has the operator maintained documentation of internal corrosion coupon monitoring at a minimum of 2 per year/ 7 1/2 months?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>Ameren Kewanee does not conduct corrosion coupon testing within the gas distribution system.</i>		
[192.491][192.481]	Has the operator maintained documentation of atmospheric corrosion control monitoring at a minimum of 1 per 3 years/ 39 months?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>The operator completes atmospheric corrosion surveys as part of leak surveys. Ameren is permitted to conduct atmospheric corrosion surveys along with leak surveys every 4 years per a waiver granted by PHMSA. The documentation from the leak survey "daily sheets" include details such as disbonded coating, need for paint, condition/position of riser, etc.</i>		
[192.491][192.479]	Has the operator maintained documentation of corrective action where atmospheric corrosion was discovered?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Staff reviewed documentation of atmospheric corrosion issues identified during a previous leak survey, then used the GCS system to track the work order number associated with the issue to verify work was completed.</i>		
[192.491][192.483(a),192.483(b),192.483(c)]	Has the operator maintained documentation demonstrating that pipe removed due to external corrosion has been repaired or replaced with pipe that was coated and cathodically protected?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>All steel repair pipe used in Ameren's system is coated. The O&amp;M stipulates that cathodic protection is applied to the repaired pipeline within 1 year, however, Ameren Kewanee's system utilizes rectifiers so cathodic protection is typically verified at the time of repair.</i>		

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TRAINING - 83 IL ADM. CODE 520		Status
[520.10(a) (1)]	Has the operator maintained documentation demonstrating that personnel have received adequate training?	Satisfactory
<b><u>General Comment:</u></b> Ameren Illinois utilizes an electronic records system of training completed. This shows all company training, date of completion and includes reminders for when next training session is due.		
[520.10(a) (2)]	Do training records include verbal instruction and/or on the job training for each job classification?	Not Checked
<b><u>General Comment:</u></b> Training records are maintained at the Pawnee Operating Center and were not reviewed during this audit.		
[520.10(b)]	Has the municipal operator maintained documentation demonstrating that personnel have received adequate training?	Not Applicable
<b><u>General Comment:</u></b> Ameren Kewanee is not a municipal operator.		
[520.10(a)(5)]	Are procedures periodically updated to include new materials, new methods of operation and installation, and changes in general procedures?	Satisfactory
<b><u>General Comment:</u></b> Updates to procedures are released bi-annually. These updates include new materials, new methods of operation and installation, and general procedures.		

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